

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**AARON T. DANIELS (a/k/a “HARUN
MUHAMMAD”) and (a/k/a “ABU YUSUF”),**

Defendant.

CASE NO. 2:16-cr-222

CHIEF JUDGE EDMUND A. SARGUS, JR.

**GOVERNMENT'S PLEA AGREEMENT SUBMISSION
OF ELEMENTS AND PENALTIES FOR
18 U.S.C. § 2339B**

**1. ELEMENTS: Providing or Attempting to Provide Material
Support to a Designated Foreign Terrorist Organization
18 U.S.C. § 2339B
(Count Two)**

- First: The defendant knowingly provided or attempted to provide material support or resources to a foreign terrorist organization; and;
- Second: The defendant knew that the organization was a designated terrorist organization, or that the organization had engaged or was engaging in terrorist activity or terrorism; and
- Third: These acts occurred on or about the dates alleged in the Indictment in the Southern District of Ohio and elsewhere.

2. PENALTIES

- A. Mandatory Minimum: None.
- B. Possible Maximum: Twenty years in prison, a fine of \$250,000.00, a term of supervised release for life, and \$100 special assessment.

Respectfully submitted,

BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY

s/Jessica W. Knight

JESSICA W. KNIGHT (0086615)

JESSICA KIM (0087831)

Assistant United States Attorneys

JOSEPH M. GIBSON

Special Assistant United States Attorney (0084587)

303 Marconi Boulevard, Suite 200

Columbus, Ohio 43215

Phone No.: (614) 469-5715

Fax No.: (614) 469-2200

Email: Jessica.Knight@usdoj.gov

Email: Jessica.Kim@usdoj.gov

s/Michael J. Dittoe

Michael J. Dittoe (6191470)

Trial Attorney

U.S. Dept. of Justice

National Security Division

Counterterrorism Section

950 Penn. Ave., N.W.

Washington, D.C. 20530

Phone No.: (202) 307-3804

Email: Michael.Dittoe2@usdoj.gov